

## **EXHIBIT 5**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION

KATHLEEN KITTERMAN, ANNA CRONIN,  
CORRIE BALL, MARVIN BALL,  
MARGARET BROGAN and EVAN JONES,

Plaintiffs,

v.

Case No. 2:12cv146

CLAUDIO TOVAR-GUZMAN,  
FORTINO GARCIA AND SONS HARVESTING, INC.  
KUZZENS, INC., d/b/a LIPMAN,  
LFC AGRICULTURAL SERVICES, INC., d/b/a LIPMAN  
and LFC ENTERPRISES, INC., d/b/a LIPMAN,

Defendants.

LFC AGRICULTURAL SERVICES, INC.'s  
ANSWERS TO PLAINTIFFS' INTERROGATORIES

The undersigned states that upon information and belief, the following answers to  
interrogatories are true and correct.

LFC AGRICULTURAL SERVICES, INC.

By [Signature]

STATE OF Florida

CITY OF Collier

, to-wit:

Subscribed and sworn to before me this 1 day of August, 2014.

[Signature]  
Notary Public

My Commission Expires: 7/24/2016



2011.

**ANSWER:** See Exhibit 1 to the deposition of Fortino Garcia & Sons Harvesting, Inc.

9. State why the Bus was driven to the Eastern Shore of Virginia on July 2, 2011 and whether the reason the Bus was on the Eastern Shore of Virginia was related to any business purpose of LFC Agricultural Services, Inc. or related to any contract, business relationship or agreement either written or oral with any other entity or person, identifying the party with whom LFC Ag contracted, had a business relationship or agreement, and whether the agreement or contract was in writing or oral, and the substance and purpose of any contract, business, relationships, service agreement.

**ANSWER:** The bus was owned by Fortino Garcia & Sons Harvesting, Inc. A deposition of Fortino Garcia & Sons Harvesting, Inc., was taken, during which there was testimony about the reason and circumstances of the bus being driven to the Eastern Shore of Virginia on or about July 2, 2011. LFC Agricultural Services, Inc., had no involvement in the driving or the transport of the bus, the employment of the driver of the bus, or the ownership of the bus. Upon information and belief, Fortino & Sons Harvesting, Inc. planned to use the bus to transport farm laborers from their housing to the farms and back each work day.

10. Please describe the physical location of LFC Ag., indicating the type of commercial structure (e.g., office building, warehouse, etc.), the size of this location, the number of employees working at this location and whether or not LFC Enterprises owns or leases its offices at this location and if it share this space with any other businesses and/or associations.

**OBJECTIONS:** Federal Rule of Civil Procedure 26(b)(1) permits parties to obtain discovery regarding any non-privileged matter that is relevant to any parties' claim or defense.